

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LULAC, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, in his official capacity as Governor of Texas, *et al.*,

*Defendants.*

Case No.: 3:21-CV-00259-DCG-JES-JVB  
[Lead Case]

ROY CHARLES BROOKS, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, in his official capacity as Governor of Texas, *et al.*,

*Defendants.*

Case No. 1-21-CV-00991-DCG-JES-JVB  
[Consolidated Case]

**BROOKS PLAINTIFFS' SECOND AMENDED DESIGNATION OF EXPERTS  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(2)(A)**

Pursuant to the Scheduling Order, the Brooks Plaintiffs designate the following expert witnesses for the trial or any other evidentiary proceeding in this matter.

**I.**

**Retained Expert Witnesses**

1. Matt Barreto, Ph.D.  
University of California, Los Angeles  
3250 Public Affairs Building  
Los Angeles, CA 90065  
barretom@ucla.edu  
909-489-2955

Dr. Barreto will testify regarding his reports and previously disclosed file materials and prior testimony. He will also testify regarding the report and file materials served contemporaneously herewith. His testimony and opinions offered at the Preliminary Injunction are incorporated herein.

2. Jeronimo Cortina, Ph.D.  
The University of Houston  
3551 Cullen Boulevard, Room 447  
Houston, TX 77204-3011  
[jcortina@central.uh.edu](mailto:jcortina@central.uh.edu)  
713-743-3894

Dr. Cortina will testify his reports and previously disclosed file materials and prior testimony. His testimony and opinions offered at the Preliminary Injunction are incorporated herein.

3. J. Morgan Kousser, Ph.D.  
Caltech  
Prof. of History and Social Science, Emeritus  
1818 Craig Ave.  
Altadena, CA 91001-3430  
[kousser@caltech.edu](mailto:kousser@caltech.edu)  
626-395-4080

Dr. Kousser will testify regarding his report and file materials provided.

4. Tye Rush, Ph.D.  
Department of Political Science  
University of California Davis  
One Shields Avenue  
Davis, CA 95616  
530-752-1011  
[trush@ucdavis.edu](mailto:trush@ucdavis.edu)

Dr. Rush will testify regarding the report and file materials served contemporaneously herewith.

## II. Non-Retained Expert Witnesses

The Brooks Plaintiffs hereby designate and state that they intend to call for the purpose of fact and/or opinion testimony those persons listed in the witness disclosures of each party, as appropriate. Brooks Plaintiffs specifically give notice that they intend to rely on the expert testimony of other Plaintiffs groups and may independently call the experts designated by the other Plaintiffss in the event they do not do so or only call for a limited purpose. In order to streamline trial presentation and not present overly duplicative testimony, Brooks Plaintiffs will rely on expert opinions given by other experts called by other Plaintiffs and their counsel. The designation of experts, reports and expert disclosures served by other Plaintiffs are incorporated herein for all

purposes. Plaintiffs make this designation without conceding the qualifications, relevancy, reliability or admissibility of such witness' opinions.

**III.**  
**Additional Designation**

Plaintiffs hereby cross designate and state that Plaintiffs may call any expert witness identified or designated by any party or any employee or representative of any party, subject to any objections that Plaintiffs may make concerning the designation or qualifications of those witnesses.

Plaintiffs reserve the right to elicit by way of cross examination, opinion testimony from experts or representatives or other witnesses who may be qualified to render expert testimony designated and/or called by other parties to the suit.

Plaintiffs reserve the right to elicit by way or direction/cross examination, opinion testimony from fact witnesses who may be qualified to render testimony, but are not retained or designated experts at this time and who have expertise in certain areas regarding the facts of this case. Such non-retained expert witnesses may be employees of the State of Texas but they have not been employed for the purpose of providing expert testimony.

Plaintiffs reserve the right to elicit by way of direct/cross examination, opinion testimony for experts designated and/or called by other parties to the suit.

Plaintiffs reserve the right to supplement this designation as necessary and to solicit opinion testimony from such persons as appropriate during both discovery and trial.

Plaintiff designates and reserves the right to call any expert designated by Defendants or called by Defendants at hearing or trial.

**IV.**  
**Supplementation and Amendment Disclaimer**

The Brooks Plaintiffs specifically reserve the right to supplement and/or amend these designations, including the expert reports provided with these designations to review, assess, and incorporate as necessary any discovery that becomes available after this designation. Defendants

have successfully delayed and/or avoided discovery in this matter on a number of fronts. All of the experts in this case for all of the Plaintiffs in this redistricting litigation would benefit from additional discovery, particularly deposition discovery and fulsome document production discovery.

March 31, 2025

Respectfully submitted,

/s/ Chad W. Dunn  
Chad W. Dunn (Tex. Bar No. 24036507)  
Brazil & Dunn  
1900 Pearl Street  
Austin, TX 78705  
(512) 717-9822  
chad@brazilanddunn.com

Mark P. Gaber\*  
Mark P. Gaber PLLC  
P.O. Box 34481  
Washington, DC 20043  
(715) 482-4066  
mark@markgaber.com

Jesse Gaines\* (Tex. Bar. No. 07570800)  
6015 Meadowbrook Drive  
Fort Worth, Texas 76112  
(817) 654-1161  
gainesjesse@ymail.com

Molly E. Danahy\*  
P.O. Box 51  
Helena, MT 59624  
(406) 616-3058  
danahy.molly@gmail.com

Sonni Waknin\*  
6417 N. Figueroa Street, #10  
Los Angeles, California 90042  
732-610-1283  
sonniwaknin@gmail.com

\*Admitted *pro hac vice*

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that all counsel of record were served a copy of the foregoing this 31st day of March 2025, by email.

/s/ Chad W. Dunn  
Chad W. Dunn